

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

GOLDSTONE FINANCIAL GROUP, LLC,
AND ANTHONY PELLEGRINO

Plaintiffs,

v.

FINANCESCAM.COM

Defendant.

Case No. 1:25-cv-07283-SRH

**DECLARATION OF ANTHONY PELLEGRINO IN SUPPORT OF PLAINTIFFS'
MOTION FOR INJUNCTIVE RELIEF**

I, Anthony Pellegrino, make the following declaration pursuant to 28 U.S.C. § 1746.

1. My name is Anthony Pellegrino. I hold a Series 65 securities license, as well as various multi-state insurance licenses. I have worked in the financial industry for nearly twenty years.
2. I am the co-founder and CEO of Goldstone Financial Group, LLC (“Goldstone”). I co-founded Goldstone in 2000, and it was incorporated in 2008. I use my name in connection with Goldstone, so my name is synonymous with Goldstone, and consumers associate it with Goldstone.
3. Goldstone provides a wide range of financial services for clients ranging from retirement planning, wealth management, and investment planning. Goldstone is an SEC Registered Investment Advisor and is accredited with the Better Business Bureau and has an A+ rating. It has approximately 50 employees who are all based in Illinois.
4. I am the owner of Trademark Registration Nos. 4,480,963 (the “963 Mark”) and 4,342,235 (the “235 Mark”), which are both incontestable and registered on the Principal

Register in the United States Patent and Trademark Office. The '963 Mark and the '235 Mark look like this:

| '235 Mark | '963 Mark |
|---------------------------|--|
| GOLDSTONE FINANCIAL GROUP |  GOLDSTONE — FINANCIAL GROUP — |

5. In addition to these registered Marks, consumers closely associate my name—Anthony Pellegrino—with Goldstone and the financial advisory services we provide. This is also true for Brian Korianek, Goldstone’s Partner and Vice President of Wealth Management.

6. The Marks represent incalculable goodwill to Goldstone. Goldstone has invested significant resources, including advertising, promotional efforts, and decades of the highest quality financial services to build that goodwill.

7. Sometime in May 2025, I learned that FinanceScam.com, as well as its associated Network of websites (collectively “FinanceScam”), was publishing articles about Goldstone, Brian Korianek, and me, alleging and insinuating that we lacked the integrity and ethics required for the fiduciary nature of the financial services we provide, and falsely claiming that we committed various criminal acts. These claims are all false.

8. Eventually, FinanceScam began accusing Goldstone, Brian Korianek, and me of “blatantly committing serious crimes in trying to censor information on Google.” (*See ECF 1, ¶ 100.*) Specifically, FinanceScam accuses me, and those it claims are affiliated with me, of (1) forging a court order (2) hiring hackers and filing false DMCA notices, (3) attempting to bribe FinanceScam, and (4) sending death threats. These claims are all false.

9. I am aware of numerous instances where potential clients specifically canceled meetings with Goldstone, Brian Korieneck, myself, and other Goldstone advisors after viewing (and believing) FinanceScam's false and defamatory content. For example, multiple potential clients had signed transfer paperwork but then cancelled the transfers after seeing FinanceScam's content. FinanceScam's activities have caused Goldstone repeated and substantial financial losses.

10. FinanceScam's campaign against Goldstone, Brian Korieneck, and me is irreparably damaging the incalculable goodwill we have spent decades nurturing. I do not believe any amount of monetary relief can make up for this damage. If this continues unchecked, I believe it will threaten Goldstone's ability to stay in business, and thus risks the livelihoods of Goldstone's approximately 50 Chicago area employees.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 11, 2025

/s/ Anthony Pellegrino
Anthony Pellegrino
CEO - Goldstone Financial Group, LLC